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Tradition of Excellence
1895/1995

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February 14, 1996

Joseph Cosentino, OSC
Removal Action Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
2890 Woodbridge Ave.
Edison, NJ 08837

Re: Bayonne Barrel & Drum Site

Dear Mr. Cosentino:

This is in response to EPA's letter dated September 28, 1995 which was received at our Bloomfield, New Jersey manufacturing facility on October 2, 1995. The time allowed for our Company to respond to the information requested in such letter was extended several times, the latest by telephone conversation of the undersigned on January 30, 1996 with Donna Murphy at EPA.

RESPONSES TO INFORMATION REQUEST

1. General Information about the Company.

- a. National Starch and Chemical Company.
- b. A division of Indopco, Inc., a Delaware corporation.
- c. J. A. Kennedy, President and Chairman of the Company
- d. See b. above. J. A. Kennedy, President and Chief Executive Officer.
- e. Not applicable.
- f. Not applicable.



2. Company's relationship with Bayonne Barrel & Drum.

a. Yes. The Company's Plainfield, and Bloomfield New Jersey facilities transacted business with Bayonne Barrel & Drum

i. The Company purchased reconditioned drums from and sold used drums to Bayonne Barrel & Drum for several years before it closed in 1984. We are unable to determine the length of time our Company transacted business with Bayonne Barrel & Drum.

ii. No records of specific transactions can be located. It is presumed they have been destroyed pursuant to our corporate record retention policy. The enclosed letter dated December 6, 1982 from the Company to Bayonne Barrel & Drum (Exhibit I) indicates that certain transactions occurred in Sept, Oct and Nov, 1982.

iii. The Bloomfield facility manufactured various types of water and solvent based adhesives and sealants from September 1971 until April 1994.

The Plainfield facility manufactured various types of water based, solvented and hot-melt adhesives as well as starch products from 1920 to the present.

iv. 225 Belleville Avenue
Bloomfield, New Jersey 07003
ID #NJD061073151

1735 West Front Street
Plainfield, NJ 07063
ID #NJD00287325

b. (transactional information)

i. As stated above, no other records are available to enable identification of specific dates for each transaction, nor is there any basis for providing approximate dates except from the document attached as Exhibit I.

ii. We are unable to determine the number of containers that were the subject of each transaction, except for those transactions referred to in Exhibit I.

- iii. See response to b,ii above.
- iv. The intended purpose of the transactions referred to above was for the Company to purchase reconditioned drums from Bayonne Barrel & Drum Co.
- v. No. The referenced transactions reflected purchases of reconditioned drums from Bayonne Barrel & Drum Co.
- vi. The Company had no way of knowing what such reconditioned drums previously contained since Bayonne Barrel & Drum undoubtedly purchased used drums from many different sources.
- vii. See above responses with respect to specific transactions with Bayonne Barrel & Drum.
- viii. See Exhibit I, attached.
- ix. Charlie Pipp, Corporate Purchasing.
- x. Unknown.

3. Charlie Pipp, Corporate Purchasing
c/o National Starch and Chemical Company
10 Finderne Ave.
Bridgewater, New Jersey 08807

Sanford Spector, Manufacturing Manager
National Starch and Chemical Company
1735 West Front Street
Plainfield, New Jersey 07063

4. See response to question #3 above.

5. Since 1982, the Company has had a series of Comprehensive General Liability Policies written by AIG Insurance Companies, each of which has contained an exclusion for liability arising as a result of pollution caused by the Company. In the event EPA wishes to see these policies (or any earlier policies if they are relevant) or such pollution exclusion provisions, please contact the undersigned.

6. None to our knowledge.

7. We have no other information at this time. If we discover additional information at a later time, we will supplement our response appropriately.

Very truly yours,

A handwritten signature in cursive script, appearing to read "A. M. Samson, Jr.", followed by a period.

Alexander M. Samson, Jr.
Counsel, Regulatory Affairs

AMS:
47154.1